

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**DANYEL N. LEFTRIDGE,**

**Plaintiff,**

**v.**

**Civil Action No. \_\_\_\_\_**

**UNITED STATES OF AMERICA,**

**Serve: Hon. Merrick B. Garland  
Attorney General  
Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530**

**and**

**Jessica D. Aber, Esq.  
United States Attorney  
Eastern District of Virginia  
2100 Jamieson Avenue  
Alexandria, VA 22314**

**Defendant.**

**COMPLAINT  
(FTCA: USPS Mail Truck Negligently Strikes Motorist)**

**JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1331 because this action arises under the laws of the United States, namely the Federal Tort Claims Act (“FTCA”), 28 U.S.C. §§ 2671-2780. Additionally, the Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1346 in that this is a claim against the United States for money damages, accruing on or after January 1, 1945, for personal injury caused by the negligent and wrongful acts and omissions of an employee of the government

while acting within the course and scope of her employment, under circumstances where the Defendant, if a private person, would be liable to the Plaintiff.

2. Venue is proper in this Court pursuant to the provisions of 28 U.S.C. § 1391(b)(2) and Local Civil Rule 3(C) because a substantial part of the events giving rise to the claim (*i.e.*, the crash described *infra* at ¶¶ 9-12) occurred in this judicial district and division.

3. On or about July 20, 2020, Plaintiff submitted a claim (via Standard Form 95) to the United States Postal Service, Tort Claims/Accident Investigation Department for the claims and damages described herein. A subsequent submission was sent to the same department on August 26, 2021. A supplemental submission was sent to the same department on October 4, 2021 providing additional records of Plaintiff's medical treatment.

4. Despite the passage of more than six months since Plaintiff's claim was filed, the United States Postal Service has failed to make final disposition of the claim.

5. In compliance with 28 U.S.C. § 2675(a), Plaintiff has elected to commence this action under 28 U.S.C. § 2674.

### **PARTIES**

6. Plaintiff, Danyel Leftridge, is an adult resident of the Commonwealth of Virginia.

7. Defendant, the United States of America, is subject to suit under the FTCA for the negligent or wrongful acts and/or omissions of its agents, servants, employees and/or personal service contractors, including but not limited to members of the United States Postal Service ("USPS").

8. At the time of the events described herein, Fullissa A. Campbell was operating a USPS vehicle within the course and scope of her employment by the USPS.

### **FACTS**

9. On June 1, 2020, Plaintiff was operating a motor vehicle northbound on Queensdale Drive in Prince William County, Virginia.

10. As Plaintiff passed through the intersection of Queensdale Road and Mapledale Plaza, Ms. Campbell was operating a USPS vehicle westbound on Mapledale Plaza and failed to heed a stop sign, crashing into Plaintiff.

11. As a direct result of the collision, Plaintiff suffered serious injuries, some or all of which are permanent in nature, including without limitation injuries to her head, neck, back, limbs, and other parts of her body.

12. As a further direct result of the collision, Plaintiff has incurred, and will continue to incur, substantial medical bills and expenses associated with the treatment of her injuries and has suffered, and will continue to suffer, significant physical pain, mental anguish, diminished quality of life, and other damages, including lost income.

### **COUNT I** **(Negligent Operation of USPS Vehicle)**

13. Plaintiff incorporates by reference the foregoing paragraphs and further alleges that at all times relevant herein, Ms. Campbell owed Plaintiff and other users of the road a duty to operate her vehicle with reasonable care and in a safe, prudent, and appropriate manner consistent with motor vehicle safety and traffic laws then and there in effect.

14. Ms. Campbell breached this duty in the following ways:
- a. by failing to pay full time and attention to the operation of the vehicle;
  - b. by failing to operate the vehicle at a safe speed under the conditions;
  - c. by failing to keep a proper lookout under the conditions;
  - d. by failing to maintain proper control of the vehicle;

- e. by failing to stop at a stop sign;
- f. by failing to timely apply brakes or otherwise take appropriate actions to avoid or minimize the effects of the collision; and
- g. by otherwise failing to adhere to the applicable traffic and motor vehicle regulations then and there in effect.

15. As a direct and proximate result of Ms. Campbell's negligence, Plaintiff suffered the injuries and damages set forth above.

WHEREFORE, Plaintiff, Danyel Leftridge, respectfully requests that the Court enter judgment in her favor and against Defendant, the United States of America, for compensatory damages in an amount to be proven at trial and no less than \$202,349.65, plus interest and costs.

Dated: August 12, 2022

Respectfully submitted,

By: /s/ R. Braxton Hill, IV  
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